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May 9, 2021

BY ECF

Hon. Lewis J. Liman United States District Judge U.S. Courthouse 500 Pearl Street New York, NY 10007 REQUEST GRANTED.

The Court approves and assigns CJA Jacob Mitchell to work on the case as associate counsel.

5/10/2021 so ordered.

LEWIS J. LIMAN United States District Judge

Re:

United States v. Isabella Pollok

20 Cr. 110 (LJL)

Dear Judge Liman:

On April 16, 2021, I was appointed by this Court as CJA counsel to represent Defendant Isabella Pollok in the above-captioned matter. This letter requests permission to expend CJA funds to hire an associate counsel, Jacob Mitchell, Esq., to assist me and co-counsel David Bertan in reviewing the mammoth amount of discovery in this case, preparing and organizing materials in this case; as well as helping me and Mr. Bertan to research and write pre-trial motions, and to prepare for trial, if that becomes necessary.

As can be seen in his attached resume, Mr. Mitchell graduated from law school more than a decade ago. Since that time, he has acquired extensive legal skills in document review, and in preparation for and assistance in federal criminal trials. Mr. Mitchell has been approved by District Judges in this District and the Eastern District to help CJA attorneys try cases in this District and the Eastern District.

In addition, this year alone Mr. Mitchell has assisted me in obtaining pleas and successful sentences from Judges in this District, among other cases the following: *United States v. Tracey Smith*, 20 Cr. 52 (DLC); *United States v. Juan Becerra*, 20 Cr. 281 (JPO); *United States v. Armando Barbier*, 19 Cr. 677 (LTS). A number of other cases are awaiting sentencing in the next few weeks.

Mr. Smith also helped me prepare for trial before Judge Vernon S. Broderick in *United States v. Dean Jones, et al.*, 15 Cr. 153 (VSB). Our client pled guilty five days before that case proceeded to trial. In all of the cases in which Mr. Mitchell has assisted me, his organization of discovery materials has been excellent; and his formulation of motion and sentencing memoranda has been professional.

I respectfully request this Court to assign and approve Mr. Mitchell to work on this case as associate counsel. Using Mr. Mitchell to do this work and assist both Mr. Bertan and me in advance of a possible trial would be cost effective since I am seeking a \$110 hourly rate for Mr. Mitchell compared to the \$155 hourly rate for me and Mr. Bertan.

Thank you for the Court's consideration of this application..

Respectfully submitted,

/s/

Richard B. Lind

Attachment

Jacob B. Mitchell

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(540) 273-3400

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EDUCATION

New York Law School, J.D., May 2010

Admission - New York State, SDNY, EDNY

Fordham University, May 2005

Graduate School of education

Bard College, B.A., Political Science, May 2004

 Awarded - Certificate of Intensive Study at Bard Globalization and International Affairs Program

EXPERIENCE

The Law Office of Jacob Barclay Mitchell

December 2014 - Present

Federal Criminal Defense Attorney

- Member of trial team for defendant Ryan Quashie in U.S v. Ryan Quashie 14 Cr 376 (BMC).
 Client was acquitted on top two counts of Hobbs Act Robbery and Attempted Hobbs Act Robbery.
- Member of trial team for defendant Demetrius Washington in People v. Demetrious
 Washington 2607-2016, seven weeks of trial, 22 count indictment with 84 overt acts,
 including homicide, gang assault, weapons possession and conspiracy to commit murder.
 Acquitted of homicide, convicted of lesser counts.
- Assist solo practitioners representing clients in criminal cases, including, Stephanie Carvlin, Susan Walsh, Allan Haber, Kenneth Paul, Scott Tulman, Donna Newman, Avrom Robin and Richard Lind.
- Conducted multiple cross examinations and a direct examination at trial.
- Drafted sentencing submissions and argued at sentencing on behalf of clients.
- Handled arraignments, duty days and all aspects of federal criminal cases.
- Reviewed electronic discovery in mega cases with multiple terabytes of discovery.
 - Including:
 - Forensic images of servers.
 - Forensic images of cellphones.
 - Forensic images of devices.
 - Review discovery in the format of Linux, MAC and Windows.
 - Review servers used in dark web, bitcoin cryptocurrency cases.
- Make court appearances from violations of supervised release to pretrial conferences.
- Manage, organize and index electronic discovery in federal criminal cases.
- Perform legal research, writing and trial preparation.

De Novo Legal

August 2011 - December 2014

Electronic Discovery Attorney

- Conducted electronic discovery from first level review to production.
- Participated in weekly client briefings.
- Responsible for making determinations regarding document relevancy, responsiveness, confidentiality, attorney-client privilege and attorney work product.
- Redacted confidential information; created privilege log to justify legal basis of privilege to judge as well as identify potential unforeseen issues that might arise in depositions.

Brooklyn Bar Association Volunteer Lawyer Program
Foreclosure Defense Attorney

July 2011 - December 2014

- Represented homeowners in foreclosure proceedings.
- Provided counsel and guidance to clients facing the loss of their home.
- Prepared applications for mortgage modifications.
- Conducted negotiations and mediations to attain mortgage modifications for clients.
- Adept in foreclosure prevention and settlement conference procedure.

New York State Courts Access to Justice Program

February 2011 - April 2011

Public Service Graduate Fellow for Consumer Credit Project

- · Appeared before judges, interviewed and prepared clients.
- · Filed for discovery orders and hearings to contest adequacy of service.
- · Negotiated with opposing counsel and finalized settlement agreements favorable to clients.

New York State Supreme Court

May 2009 - November 2009

Law Clerk for the Honorable Emily Jane Goodman

- Drafted memoranda and opinions on myriad legal questions for the Judge.
- Conducted pre-trial conferences, led settlement conferences and assisted the Judge at trial.
- Ensured attorneys complied with court rules concerning settlements.
- · Performed legal research for cases on Judge Goodman's docket.

Kennedy, Jennik & Murray P.C.

May 2008 - August 2008

Law Clerk

- Drafted complaints, answers, arbitration briefs and amendments to pension trusts.
- Researched and prepared memoranda on state and federal labor law cases.
- · Supported partners at client interviews, client meetings, negotiations and arbitrations.
- In charge of summarizing and highlighting legal changes relating to the Delphi bankruptcy.
- Assisted in negotiations with Delphi to implement reorganization plans.

Office of Manhattan Borough President Scott Stringer

October 2006 - March 2007

- Communications Department
 - Tracked press coverage, compiled press packets and planned for Community Board meetings.
 - Digitalized and expanded database of media sources used by the communications department.

New York City Public School 334 and Middle School 245 Teacher

September 2004 - June 2006

- · Taught 6th and 7th grade Biology, Chemistry and Physics.
- · Taught 8th grade Earth Science.